



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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August 30, 2000

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor *DRH*

FROM: Peter H. Hess, Reclamation Specialist III, Team Lead *PHH*

RE: Findings for Slope Stability and Coal Waste Delineation for Pond 001, Plateau Mining Corporation, Willow Creek Mine, ACT/007/038-AM00A1

SUMMARY:

The Division reviewed and completed the initial review of Plateau's proposal to leave buried coal mine waste in the impounding embankment of sediment pond 001A prior to May 3, 2000. One deficiency, which was relative to the final disposition of the coal mine waste material upon the reclamation of sediment pond 001A was felt to exist. The permittee was given until June 28, 2000 to respond to this deficiency; the permittee's response was received in the UDNR/OGM/SLO on June 26, 2000. A portion of that response (the first page only) was received via FAX in the Price Field Office on July 11, 2000. Somehow, the status of the analysis of the permittee's response was lost in the system, and it was not until August 24, 2000 that review of all documents relative to this amendment was reinitiated. This document analyzes the permittee's response to the single deficiency aired in the Division's May 3, 2000 technical analysis.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521,

TECHNICAL MEMO

-301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

Analysis:

R645-301-542.730. Disposal of Coal Mine Waste in a Controlled Manner to Meet Reclamation and Revegetation Standards/Approved Post Mining Land Use.

Pond 001 will remain in place at the Willow Creek site to act as the primary means of sediment control from the reclaimed mine facilities area at least through Phase I. When the permittee receives authorization from the UDNR/OGM to remove pond 001 (following a determination that successful vegetation and effluent standards can be met) the question of the permanent disposal of the coal mine waste in the pond 001 embankment will arise. Waste Handling is discussed in Volume 1, Section 4.5 Engineering Design, page 4.5-22. However, since the section of Willow Creek channel which was relocated through proper permitting procedures with the U.S. Army Corps of Engineers is to remain in place, and since the portion of impounding embankment relative to the placement of coal mine waste in the pond 001A embankment is within a section of the northern bank of that relocated channel, the area under review **will not be reclaimed**. The reclamation of pond 001A will be to **NOT** remove the impoundment, but rather to fill it and topsoil the area.

An examination of Map 22, Mine Surface Facilities Area Premining/Postmining Cross Sections, Cross-Section E-E' indicates that the embankment which separates the pond 001A incisement from the Willow Creek realignment section will be lowered approximately ten feet in elevation (finished elevation). This will place at least some of the coal refuse material very close to the surface.

In the permittee's letter of June 23, 2000, Mr. Pappas indicates on page 2, paragraph 2, that a minimum of three feet of soil material is in place over the refuse material, and that additional material will be placed during the final reclamation of the pond 001A area. This contradicts what is shown by Map 22, Cross Section E-E'. Mr. Pappas is aware of this and when the issue was discussed, he indicated that it has always been the permittee's intent to revise the reclamation plan for the Willow Creek site to reflect a correction of this contradiction for the reclamation of pond 001A, as well as other problems within the reclamation plan.

A re-evaluation of the final disposition of the coal refuse material which has been placed within the embankment will need to be made upon the review and approval of the revised reclamation plan for the pond 001A area. The affect of that material on the revegetation potential as it relates to the approved post mining land use must be made at that time.

Findings:

R645-301-542.730, Disposal of Coal Mine Waste in a Controlled Manner to Meet Reclamation and Revegetation Standards/Approved Post Mining Land Use.

The requirements of R645-301-542.730 can not be addressed at this time due to an inadequacy in the reclamation plan for the pond 001A area. That reclamation plan must be revised to reflect the permittee's intentions relative to the backfilling and final contour of that reclaimed area. At that time, the permittee must address the final disposal of the coal mine waste within the embankment and its affect on the revegetation standards as they relate to the approved post mining land use.

The requirements of R645-301-542.730 cannot be addressed at this time.

RECOMMENDATIONS:

The permittee has provided adequate justification to confirm that the pond 001A embankment which has been partially constructed using coal mine waste as a construction medium will be stable throughout the pond's operational stage.

The reclamation plan for the pond 001A area, as it currently exists, is not adequate to address the requirements of R645-301-542.730, as they relate to the buried coal mine waste in the pond 001A embankment..

It is recommended that the Division approve the slope stability analysis documented in ACT/007/038-AM00A, with the stipulation that the permittee address the deficiencies within the reclamation plan in a timely fashion, such that the requirements of R645-301-542.730 as they relate to the re-vegetation standards for the pond 001A embankment can be addressed.